EXHIBIT 1 [REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED]

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Row in Plaintiffs' Ex. 72 or Exhibit	<i>-</i>	Plaintiffs' Description	Seagate's Response
1	FED_SEAG0076611	Internal Seagate Spreadsheet tracking customer complaints for 30 days on Twitter	This document cannot relate to the Drives because it covers 2011-02-01 to 2011-03-01 — which is <i>before the ST3000DM001 was manufactured</i> . See ECF No. 150-6 (Almgren Decl.), ¶ 11 (ST3000DM001 first approved for manufacture on April 28, 2011).
2	FED_SEAG0093297	Seagate document recording customer reviews on Amazon from 1/1/2011 to 4/7/2011	This document cannot relate to the Drives because it is dated 2011-04-06 — which is <i>before the ST3000DM001 was manufactured.</i> See ECF No. 150-6 (Almgren Decl.), ¶ 11 (ST3000DM001 first approved for manufacture on April 28, 2011).
3	FED_SEAG0076936	Internal Seagate document tracking 954 negative customer reviews for drives on Amazon, Bazaarvioce, and Best Buy between 2011 and 2012.	This document references numerous products and sizes of drives not at issue in this litigation. Plaintiffs quote three "example reviews." <i>None of them relates to the Drives at issue</i> . The first two are Amazon reviews attached hereto as Exhibit A . They are for 2TB products. Plaintiffs cut off the remainder of the third review in which the reviewer specifies that the review is for a 1TB drive – the "barracuda 720012 1TB sn. 6VPAGXJA" – not the 3TB ST3000DM001 Drive at issue in this litigation. In addition, the comment is dated 8/21/2011, and the ST3000DM001 was not approved for manufacture as a "Barracuda" Internal drive product until October 18, 2011. <i>See, e.g.</i> , ECF No. 133-5, fn. 3; ECF No. 152-3, ¶ 4 ("Barracuda" was an Internal product); ECF No. 150-6, ¶ 18 (ST3000DM001 not approved for manufacture as an Internal drive until October 2011). Accordingly, the third review also does not relate to the ST3000DM001. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
4	FED_SEAG0093523	46,960 customer	The table relates to at least 54 different products, <i>more than half of which (at least 29) are not at issue</i> . In addition, while the table contains over 46,000 <i>rows</i> , many rows relate to the same customer and drive (same serial number). For example, 11 rows relate to a drive with serial number S1F07CPR; 8 rows

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Row in Plaintiffs' Ex. 72 or Exhibit	Document Cited by Plaintiffs	Plaintiffs' Description	Seagate's Response
			relate to a drive with serial number S1F07MVQ, <i>etc</i> . Furthermore, a large number of the contacts are <i>not complaints</i> . For example, one exchange involves a customer inquiring "I am looking for a second power cable since the first was lost;" another asks "Is it possible to purchase the Seagate GoFlex Home Network base and use it with the hard disk drive?;" another asks "Does the Windows version of this software includes a means by which to override the sleep settings?;" another reports "Thank you, the problem is finally solved. Your support has been most appreciated." None of these interactions relate to drive failures. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
5	FED_SEAG0076706	Internal Seagate document tracking Expansion reviews Amazon, noting that Drive Failures are most common complaint	This document contains reviews for multiple sizes of drives not at issue in this litigation, including 750 GB, 500 GB and 1TB products. Plaintiffs claim that drive failures are the most common complaint, and reproduce Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
6	FED_SEAG0076615	Internal Seagate document tracking Expansion reviews Amazon, noting that Drive Failures are most common complaint	This is the same document as FED_SEAG0076706, discussed in the row above. Plaintiffs quote two reviews. Exhibit B hereto is a true and correct copy of the second review Plaintiffs quote. The review is for a 1TB "portable" drive, at issue in this action. The other review is for the Seagate Expansion Desk 3TB product, for which Amazon shows 62% 5-star reviews and only 13% 1-star reviews. See Exhibit C hereto. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
7	FED_SEAG0076609	Internal Seagate document tracking	This document covers numerous products and sizes of drives not at issue (including wireless products, portable products and other product types, sizes

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

		Plaintiffs' Description	Seagate's Response
		reviews and Seagate's public responses	and categories). Plaintiffs cite three reviews that appear to relate to products at issue. The document contains links to the reviews on Amazon's website. Two reviews relate to the Seagate Expansion Desk 3TB product, <i>for which Amazon shows 62% 5-star reviews and only 13% 1-star reviews</i> . Copies of these reviews on Amazon's website are attached hereto as Exhibit D . The third relates to the Seagate Backup Plus 3TB product, for which Amazon shows <i>51% 5-star reviews and only 23% 1-star reviews</i> . A copy of these reviews on Amazon's website is attached hereto as Exhibit E . As explained in row 16, these rates of 1-star reviews are similar to those for hard drives from other companies. Plaintiffs provide no evidence that any of this information is capable of demonstrating an unreasonably high failure rate.
8	FED_SEAG0093489	Seagate spreadsheet detailing direct customer complaints	This document covers numerous products and sizes of drives not at issue (including wireless products and even products from other manufacturers). Plaintiffs cite one customer message about an "Expansion Desk" but there is no evidence this customer's comment related to the 3TB ST3000DM001 Drive. The Expansion Desk came in at least four sizes (from 1TB to 4TB) (ECF No. 152-3, Ex. 22 at FED_SEAG0070325) and only the 3TB version is at issue in this litigation. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
9	FED_SEAG0093490	Spreadsheet detailing 102,135 customer complaints to Seagate – all complaints are for drives at issue	Plaintiffs' claims about this document are false. This document is an Excel spreadsheet with 102,135 <i>rows</i> . The rows relate to <i>58 different products</i> , only 6 of which are at issue and <i>52 of which are not</i> because they did not contain the ST3000DM001 Drives. The six at-issue products have model numbers STBM3000100, STBN6000100, STBP12000100, STBV3000100, STBV3000200, STCP3000100. These are the 1, 2, or 4 Bay "NAS" products and Seagate Expansion Desk and Seagate Expansion Desk Plus products. The rows that relate to at-issue products can easily be determined by consulting the fourth column of the table, which lists the model numbers of the products.

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Row in Plaintiffs' Ex. 72 or Exhibit	Document Cited by Plaintiffs	Plaintiffs' Description	Seagate's Response
			See Exhibit F hereto, which contains a printout of the first 41 rows of document FED_SEAG0093490, and the first 12 columns. Columns 1-8 appear on the first page of the printout and columns 9-12 on the second page of the printout. In the fourth column on page 1, I highlighted the model numbers for products at issue. Only eight rows out of the first 41 relate to products at issue (even though Plaintiffs falsely claim all the entries in this table relate to at-issue products). Second, the document relates to customer contacts from anywhere in the world. Approximately 20,000 entries are labeled as being from the "Americas" (North and South), 8,000 are labeled as from the Asia-Pacific region, 20,000 are from Europe, the Middle East or Africa, and the remainder do not have a geographic origin indicator. Third, it is clear that many of the customer contacts reported in this spreadsheet cannot relate to drive failures, since they include requests to help setup software, problems with the operating system ("OS") or networking, requests for the warranty end date, problems with accessories, etc. Indeed, 1,412 rows in this table relate to thank you emails to Seagate—which Plaintiffs claim to the Court are "complaints." (See Ex. F, p. 2.) Even contacts mentioning "hardware" in the first column on page two can be about "installation," "setup," "network settings" or the drive being full. (See, e.g., Ex. F, p. 2, rows 1, 5, 12, 14, 15.) Similarly, contacts about "Warranty" can simply request the warranty end date.
			I analyzed the data as follows. I assumed that all entries that mention hardware, RMAs (returns), warranty, failure, or lost data in the first column (issue filter) might relate to "failures" and included them in the analysis even though many of these entries do not relate to failures. I filtered the data to include only products at issue, and to remove duplicate entries for the same issue and drive serial number. I then tallied the non-duplicative contacts relating to hardware, warranties, RMA, failures or lost data for products at

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Row in Plaintiffs' Ex. 72 or Exhibit	Document Cited by Plaintiffs	Plaintiffs' Description	Seagate's Response
			issue. There were 12,788 such entries. As noted, these relate to the 1, 2, or 4 Bay "NAS" products and the Seagate Expansion Desk and Seagate Expansion Desk Plus products. Seagate sold 560,994 of these products <i>in the US alone</i> . (Seagate's Verified Supplemental Responses to Plaintiff Nolan's First Set of Interrogatories, Table 1.) Even assuming all 12,788 of the contacts were from the US (they were not), that gives a rate of 2.27% contacts that <i>might</i> relate to drive failures. If the 12,788 contacts were narrowed to include only contacts from the US so as to properly compare US contacts to US sales, the rate of contacts would be even lower. Similarly, as described above, the rate includes many contacts that are not related to drive failures, and so is an overestimate for this reason as well.
10	FED_SEAG0076525	Internal Seagate Spreadsheet tracking customer complaints directly to Seagate Customer Service	The cited spreadsheet covers numerous products and sizes of drives, but does have any columns specifying the model numbers or drive sizes. Generally it is not possible to tell whether any given entry relates to a product at issue in this action. Of the four "complaints" Plaintiffs quote, one clearly states that it relates to "SV35" hard drives not at issue, two provide no indication of the drive size and so there is no evidence they relate to the ST3000DM001, and one might relate to the ST3000DM001. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
11	FED_SEAG0094986	Spreadsheet of Business Bay 4 NAS reviews	This document relates to many products, most not at issue. The "Sample Review" Plaintiffs quote is <i>not related</i> to a product at issue. The document specifies that the quoted review relates to the STBP100. The document also links to the product's page on Amazon. I followed the link to the product and found the specific review at issue. Images of these pages are attached hereto as Exhibit G . The product is a diskless box (that does not contain any hard drives, much less the ST3000DM001 Drive). Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Row in Plaintiffs' Ex. 72 or Exhibit	Document Cited by Plaintiffs	Plaintiffs' Description	Seagate's Response
12	FED_SEAG0086798	Internal chart on corporate escalations of customer complaints	This document addresses multiple products and does not specify any sizes for any products. There is no evidence that any entries in the document relate to the ST3000DM001 Drive and there is no evidence that the quoted comment relates to the Drive. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
13	FED_SEAG0093307	Email between Seagate employees discussing the difficulty keeping up with warranty claims for 3TB drives	Plaintiffs misrepresent this document. It is from Seagate's recovery service, which recovers data from drives. A complete copy of this document is attached hereto as Exhibit H (FED_SEAG0093307). As Plaintiffs have argued, the recovery service <i>was not part of Seagate's warranty process</i> , but was a separate service for which Seagate charged. ECF No. 62 (Complaint), ¶ 126; <i>see also</i> https://www.seagate.com/services-software/recover/ . It is unclear what this comment means, but since Seagate Recovery Service was separate from Seagate's normal warranty process, it is irrelevant. <i>Id</i> . (Ex. H, last page),
14	FED_SEAG0090931	Internal chart on direct complaints from customers	This document contains entries relating to numerous products not at issue. Plaintiffs quote two "Sample Complaints." There is no evidence that the first relates to a product at issue in this action. Furthermore, Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
15	FED_SEAG0090915	Internal chart on direct complaints from customers	Column Z of this Excel table clearly lists the model number of the product at issue in each row. The chart contains data on 419 different products (419 different model numbers), only 22 of which are at issue in this Action. I

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Row in Plaintiffs' Ex. 72 or Exhibit	Document Cited by Plaintiffs	Plaintiffs' Description	Seagate's Response
			extracted the rows for the products at issue in this Action. There were only 112 rows relating to the products at issue. Furthermore, the focus of the chart is the results of asking customers to rate Seagate's customer support. Thus, many of the alleged "complaints" aren't complaints about drives at all but instead are comments about customer service, such as "Very patient and worked with me until problem was solved;" "He spent a great deal of his time to troubleshoot and resolve my issue with reinstalling software on my recently upgraded OS;" and the like. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
16	FED_SEAG0094984	Internal Seagate document comparing 1 star reviews for negative reviews products; ST3000DM001 has most	This document relates to reviews. Plaintiffs claim the ST3000DM001 had "the most" 1-star reviews, but do not discuss whether the ST3000DM001 also had the most reviews overall, nor <i>what percent</i> of reviews were 1-star. The document contains links to the products reviewed on the Amazon website. The ST3000DM001 product reviewed is the 3TB Desktop HDD (one of the Internal products). As shown in Exhibit I , this product had 61% 5-star reviews and only 17% 1-star reviews—3.6 times more 5-star than 1-star reviews. Furthermore, this <i>percentage</i> of 1-star reviews does not appear unusual for hard drives. Attached hereto as Exhibit J are snapshots of the review distributions for a number of hard drives from various companies. These products from Iomega, Toshiba, Western Digital and HGST have 15% to 21% 1-star reviews (and 54% to 65% 5-star reviews)—no different from the products containing the ST3000DM001 Drives. Plaintiffs also present a chart of Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

		Plaintiffs' Description	Seagate's Response
17		Seagate spreadsheet detailing direct customer complaints	This document contains entries relating to numerous products not at issue; it does not contain any rows relating to model numbers or sizes of drive, so one cannot tell whether any particular entries relate to the Drives at issue. Plaintiffs quote one comment about a "3tb" drive that may or may not be an ST3000DM001. (<i>See</i> , <i>e.g.</i> , row 19 below explaining that Seagate manufactured many 3TB drives not at issue in this case.) Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
18	FED_SEAG0085843	Internal email about customer complaints	The document does not even use the word "complaint" and says that for the first 6 months of 2015, only Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
19	FED_SEAG0084417	Seagate Presentation on the "dearth of 1- star reviews"	First, <i>this is not a new document</i> . The document (with one added sentence) was produced several times in Seagate's production 32 on 8/18/2017 (e.g., FED_SEAG0055656). In addition, Plaintiffs deposed Seagate's witnesses Alan Clark about 1-star review monitoring on October 20, 2017. Second, the charts appear to include models not at issue in this action. The "3TB" drives apparently include all "ST" model number 3TB drives. The bar graph labels these "STX3TB." This chart is from 2015. As of 2014, Seagate was selling <i>at least 12 other hard drives that were "ST" 3TB drives none of which are at issue in this Action</i> . <i>See</i> ECF No. 152-3, Ex. 23, pp. FED_SEAG0070356-59, 362 (listing 3TB STCG3000100, 3TB ST3000VM002, 3TB ST3000VM002, 3TB ST3000NM00532, 3TB ST3000NM00432, 3TB ST3000NM00632,3, 3TB ST3000NM00632,3, 3TB ST3000NM00632,3, 3TB ST3000NM000432, 3TB ST3000NC0002, 3TB ST3000NC0003). Therefore, it is not possible to conclude that the charts

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	€	Plaintiffs' Description	Seagate's Response
			relate solely or even primarily to the Drives at issue. Third, the document shows In addition, the proportion of 1-star reviews clearly varied substantially over time and across different products. See rows 7, 16 above and Exhibits. D, E, I, J, hereto. Fourth, the discussion Plaintiff quotes goes on to explain that Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
20	FED_SEAG0095597	496 customer interactions on	This document records "chat" conversation between shoppers on the NewEgg website and Seagate support. It covers numerous products not at issue. There is no indication any of the shoppers purchased the Drives or experienced any failures.
21	FED_SEAG0095597	496 customer interactions on	This is the same document as in row 20 of Plaintiffs' table. As explained above, this document records "chat" conversations between shoppers on NewEgg.com and Seagate support. It covers numerous products not at issue. There is no indication that any of the shoppers purchased the Drives or experienced any failures.
22	FED_SEAG0076421	negative reviews	The document contains purported customer reviews posted on third -party websites. The reviews relate to innumerable products not at issue (everything from a "media app" to personal cloud products and Xbox drives). Plaintiffs' Table in Plaintiffs' Ex. 72 quotes two "sample complaints." <i>Neither relates to</i>

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

		Plaintiffs' Description	Seagate's Response
			The document contains links to the third party websites containing the customer reviews. I searched and found the two "sample complaints" Plaintiffs quote. I followed the links to the actual websites containing these reviews. Attached hereto as Exhibit K are copies of the actual reviews printed from Amazon.com showing they relate to a 5TB product not at issue. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
23	[sic] actual document is	Internal discussion at Seagate regarding information on website about drives	This document is not new. The email Plaintiffs cite was produced as part of four different documents in Seagate's third production in September, 2016 (FED_SEAG0000707, FED_SEAG0000775, FED_SEAG0000781, FED_SEAG0024658). The email chain relates to the layout of Seagate's website, and how to better present information. A complete copy of this document is attached hereto as Exhibit L (FED_SEAG0084329). It has no relevance.
24	FED_SEAG0093285	Seagate document recording customer service chats with potential customers	Plaintiffs admit this document relates to " <i>potential</i> " customers. The "chat" they reproduce is multiple hearsay, apparently not based on the potential customer's personal knowledge, and is not evidence of any failures or failure rate.
25	FED_SEAG0090943	Seagate spreadsheet detailing direct customer complaints	This document contains entries relating to numerous products not at issue; it does not contain any rows relating to model numbers or sizes, so one cannot tell whether any particular entries relate to the Drives. Plaintiffs quote one comment. There is no evidence this comment relates to the ST3000DM001. Furthermore, the comment indicates that Seagate did not consistently publish AFRs for drives, and could not have made an affirmative misrepresentation to this customer. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Row in Plaintiffs' Ex. 72 or Exhibit	Document Cited by Plaintiffs	Plaintiffs' Description	Seagate's Response
26	FED_SEAG0090903	Seagate spreadsheet detailing direct customer complaints	The document covers numerous products not at issue. Without reviewing every entry, it is not possible to tell whether any of them relate to the Drive. Plaintiffs quote one comment. There is no evidence that the quoted comment relates to the Drive. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
27	FED_SEAG0090915	Seagate spreadsheet detailing direct customer complaints	This is the same document (FED_SEAG0090915) as in row 15. (See row 15 above.) It contains information on 419 different products, only 22 of which are at issue. Plaintiffs quote three "Sample Complaints" two of which (the first and third) <i>do not relate to the ST3000DM001</i> . Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
28	FED_SEAG0090966	Seagate spreadsheet summarizing all Amazon reviews for 2TB, 3TB and 4TB drives	This document is not new. Seagate produced the same documentincluding the bar graph Plaintiffs reproduce in their Exhibit 72in its production 25 on 6/16/2017 (FED_SEAG0053031). Furthermore, the document and graph are from 2015 and apparently covers all 3TB "ST" driveslabeled as "STX" drives in the spreadsheet. As discussed in row 19, by 2014, Seagate was selling at least 12 other 3TB hard drives with "ST" model numbers. There is no way to determine how many of the reviews referenced relate to the Drives at issue. Furthermore, the percentage of 1-star reviews apparently fluctuated significantly over time and between different products and different websites. It may be listed as in this chart, but it is 13% and in other contexts. See rows 7 and 19. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
The Rows b	elow contain Seagate's	response to Plaintiffs'	Exhibits 73 – 77
Plaintiffs' Exhibit 73	FED_SEAG0072969 [sic]	Plaintiffs' claim: "in Seagate's newly produced marketing	Plaintiffs misrepresent and misquote the document. The document compares and contrasts "emerging markets" vs. "developed markets." It explains,

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Row in Plaintiffs' Ex. 72 or Exhibit	e e e e e e e e e e e e e e e e e e e	Plaintiffs' Description	Seagate's Response
	Plaintiffs' Exhibit 73 is actually FED_SEAG0072901	team meeting notes, Seagate concedes ECF 175-4 at 3:10-12.	Plaintiffs misquote the statement at issue which says, in full, The document goes on to explain Thus, the document does not support Plaintiffs' claim at all.
Plaintiffs' Exhibit 74	FED_SEAG0090966	star ratings) for all the 3TB ST3000DM001 drives (the red	the same document on 6/16/2017—including the bar graph Plaintiffs reproduce in their proposed Second Supplemental Brief (ECF No. 175-4 at 4). (Seagate previously produced this same document in its production 25 as FED_SEAG0053031). Furthermore, the document and graph are from 2015 and apparently cover all 3TB "ST" drives—labeled as "STX" drives in the document and in Plaintiffs' excerpt ("STX Last 6 months"). As discussed in row 19 above, by 2014, Seagate was selling at least 12 other 3TB hard drives with "ST" model numbers. There is no way to determine how many of the reviews referenced in the chart or the document relate to the Drives at issue. Furthermore, the percentage of 1-star reviews apparently fluctuated significantly over time and between different products and different websites. It may be listed as in this chart, but it is 13% and at other times and in other contexts. See rows 7 and 19 above. Plaintiffs provide no evidence that this document or the graph they reproduce, could be used to determine a failure rate for the Drives.

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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Row in Plaintiffs' Ex. 72 or Exhibit	Document Cited by Plaintiffs	Plaintiffs' Description	Seagate's Response
		Supplemental Brief. ECF 175-4 at 4.	
Plaintiffs' Exhibit 75	FED_SEAG0094984	Plaintiffs' claim: "[d]ocuments examining Amazon reviews show astounding spikes in complaints for reliability/failure of ST3000DM001 drives." ECF 175-4 at 4:18-5:16. Plaintiffs also reproduce a chart of "Top 1 Star Issues" on page 5 of their proposed Second Supplemental Brief. ECF 175-4 at 5.	Plaintiffs' Exhibit 75 is a chart extracted from document FED_SEAG0094984. Plaintiffs cite the same document and chart in row 16 of their Exhibit 72. As explained in row 16 above, the chart covers 42 different modelsonly one of which is the ST3000DM001 drive. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives. In addition, as explained above, the document refers to 1-star reviews for the 3TB Desktop HDD (Internal product). That product had 61% 5-star reviews and only 17% 1-star reviews3.6 times more 5-star than 1-star reviews. (See Exhibit I hereto.) This percentage of 1-star reviews is well within the range for hard drives from other manufacturers. (See row 16 and Exhibit J hereto.)
Plaintiffs' Exhibit 76	FED_SEAG0094643	Plaintiffs' claim: "Seagate employee, while analyzing Amazon 1-star reviews, states	First, <i>this document is not new</i> . Seagate produced the email chain to which Plaintiffs cite on at least two prior occasions, its productions 7 and 21 on 10/21/2016 and 6/2/2017 respectively. (FED_SEAG0007293 and FED_SEAG0032683). Second, the email chain shows that the analysis covered several sizes of drives. The Seagate employee explains,

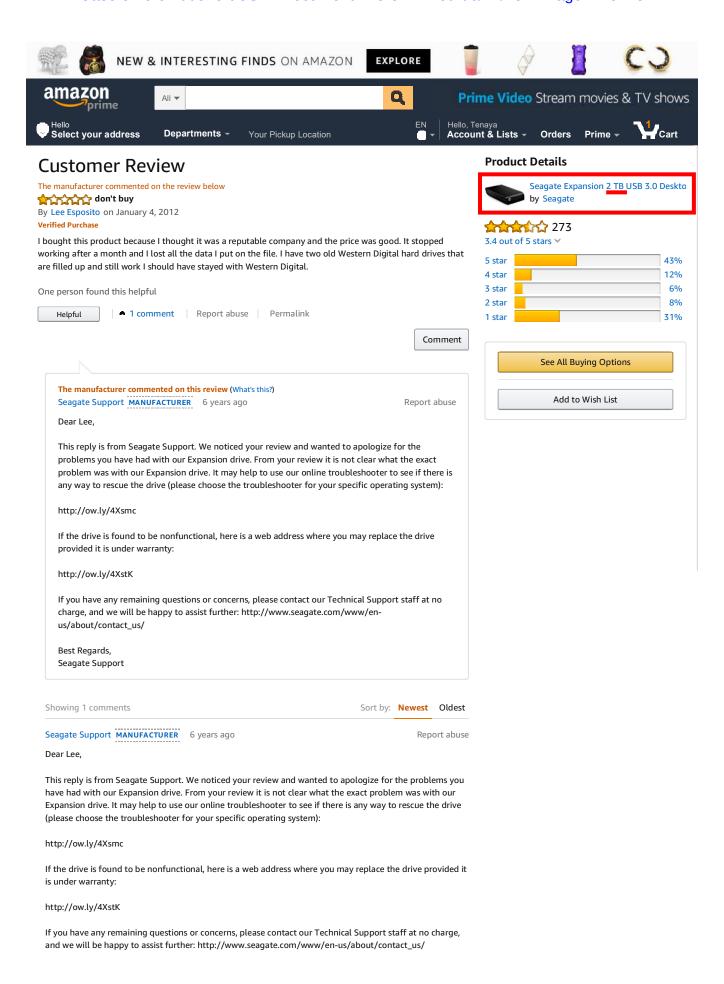
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	Document Cited by Plaintiffs	Plaintiffs' Description	Seagate's Response
		5:14-17.	There is no evidence that the comments reflect primarily or only the drives at issue in this litigation. Finally, there is nothing to indicate what the failure <i>rate</i> might have been. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives at issue.
Plaintiffs' Exhibit 77	FED_SEAG0086631- 37	and statements regarding case temperature from	Seagate, revising template reliability information pulled from another product manual to suit the Desktop HDD product. Mr. Schweiss asks the other Seagate employee on the email chain, Keith Myers, to review red text to ensure it is accurate for the Grenada BP (Desktop HDD). As the conversation continues, Schweiss edits the AFR and POH specifications to fit the Desktop

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EXHIBIT A



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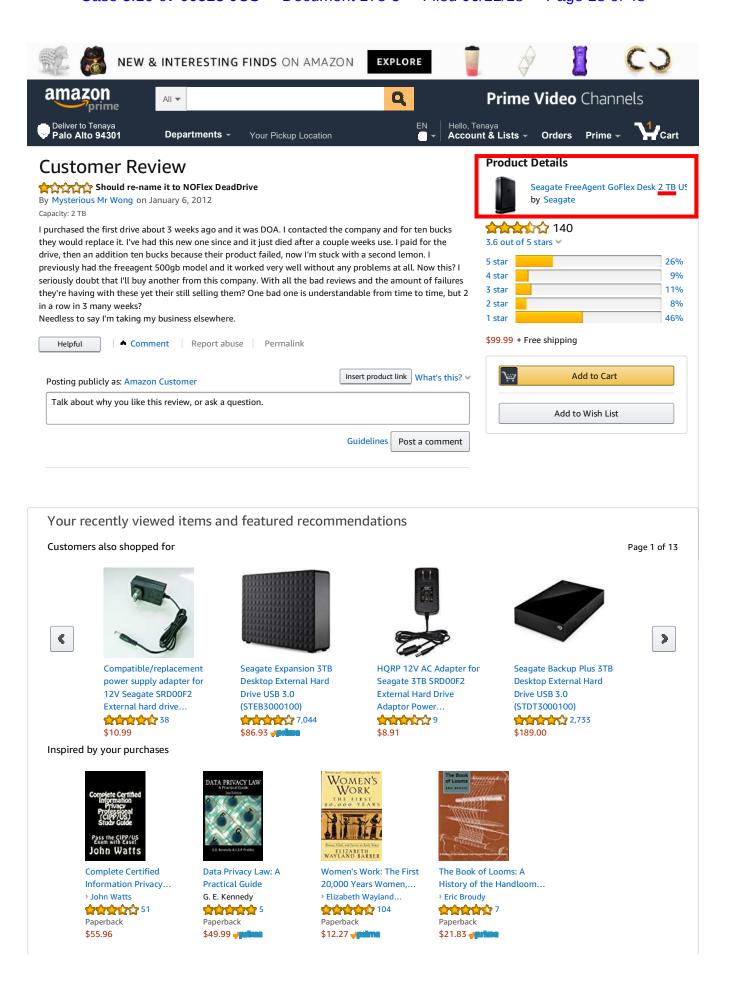


EXHIBIT B

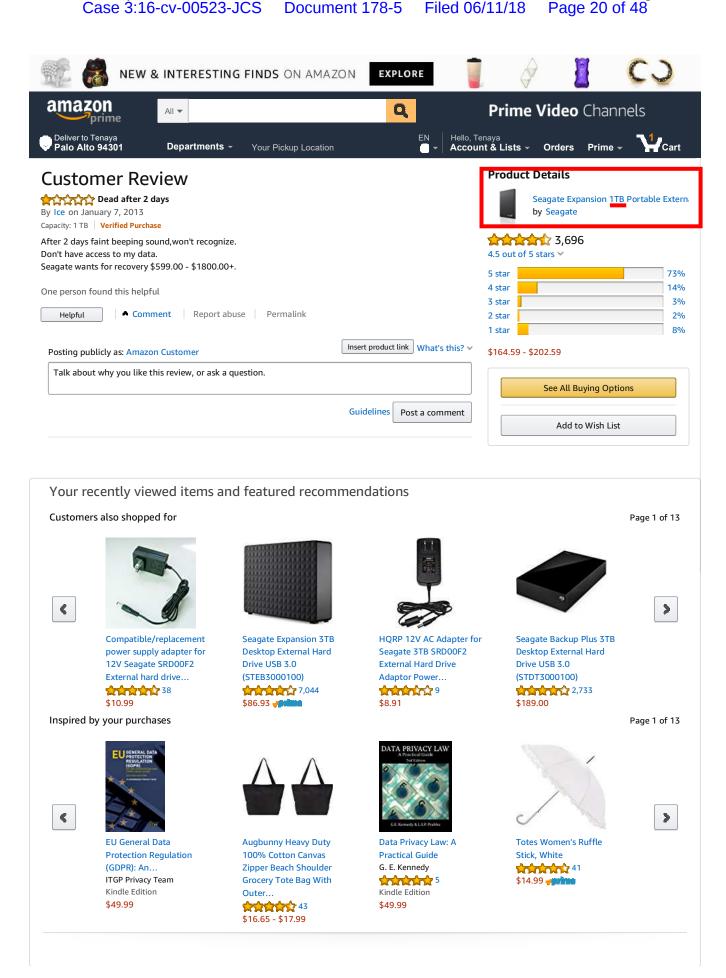


EXHIBIT C

Case 3:16-cv-00523-JCS Document 178-5 Filed 06/11/18



Two subsequent calls to Technical Support (long wait on hold but pleasant interactions) got to the root of the problem, got my data back and since the drive is flakey -- Seagate is replacing it.

So, what to conclude. I've done enough Call Center design to know that most people would accept (begrudgingly) the first line or second line refusal from Seagate to fix my problem. Since I was willing to sit on hold for 45 mintues and argue with Seagate at length they did agree to fix my problem. Since I took the time to write a one star review on Amazon I got another offer to fix the problem from Seagate. SO SEAGATE WILL ADDRESS YOUR PROBLEM BUT NOT IF YOU ASK POLITELY! That's my conclusion Seagate is free to file another answer saying they disagree. But they recorded my calls "for training purposes" and as far as I am concerned, once the first escalation led to Seagate saying "no" to me again I knew the only way to get service was to tough it out with them. I find this is almost always the case with customer service today, not just at Seagate, you have to be prepared to invest time and stand your ground to get anything.

What a sorry state customer service is in in America. And no I don't feel like thanking Seagate for addressing

my problem, they made me spend far too much time on it.

505 people found this helpful Helpful ▲ 50+ comments | Report abuse | Permalink Comment The manufacturer commented on this review (What's this?) Seagate Support MANUFACTURER 5 years ago Report abuse Dear Songster 1928. This reply is from Seagate Support. We noticed your review and wanted to apologize for the problems experienced with your Expansion Desktop drive. It is unclear from the review details what the exact problem was with this drive. We would like to talk with you in greater detail to determine the root cause and available resolution to the problem. We have created a case based on your Amazon name that shows your review and our response. Here is a web address with contact information to speak with a support representative directly:

http://seagate.com/support/contact-support/

You are not obligated to use our data recovery service if it is determined that data recovery is needed.

Best Regards, Seagate Support

Showing 5 comments Sort by: Newest Oldest

Old Timer 73 2 years ago

Report abuse

A free program called Recuva is very good at recovering most lost files. FYI.

■ Leave a reply

Wildness 2 years ago | In reply to an earlier post

Report abuse

If this was a backup then I fail to understand why you mentioned that you needed to recover the data? Get the free replacement and do a new backup.

■ Leave a reply

sabre03 2 years ago | In reply to an earlier post

Report abuse

If the unit you had was defective, and it was backed up, what is the complaint? They offered to do a data recovery on the drive, and you should have been able to return it for a refund or get it replaced. Either way you have your data. If you want to represent all of the similar model drives as being unreliable, I don't see that happening seeing that it looks like others have used them with little or no problems.

■ Leave a reply

songster1928 2 years ago | In reply to an earlier post

Report abuse

Years pass and people continue to chance upon this review with no better wY to spend their time chastising my review. Yet no one seems to have read the review before jumping in to defend Seagate.

I should have backed up the drive? First of all, it was backed up. Second, what should I back up the drive onto. Seagate sold it as a backup drive. The important word here is backup. If this is NOT the correct media for backups, what is?

Second, the drive was three weeks old. How long should I expect a product to perform it's advertised purpose?

Third: while every critic implies I am not good with technology because, as they claim erroneously, I did not back up, NOT ONE notices that I diagnosed the situation correctly, and much of my struggle with Seagate was their refusal to recognize that I had figured out the problem was in the power supply. The Seagate position that the data was lost was wrong. Why does mp not one of these critics ever notice that I figured out the real problem and had to browbeat Seagate into accepting my accurate technical assessment.

Fourth every writer asserts that no drive maker warranties data and

I am in error to accept so. But my review points out that THIS IS WRONG. Seagate says they will to recover data BUT they did so with me when I insisted. My critics are all contradicted by what actually happened.

Several critics bak, I concluded that this pattern of random criticism, and the consistency in which critics misread or distort my review is part of a campaign by Seagate to harass critics. Nothing has happened to change my assessment.

My request of the next flamer is two-fold. Come up with a new critical slant rather than regurgitating talking points. And second, write from my review and not Seagate's script.

■ Leave a reply

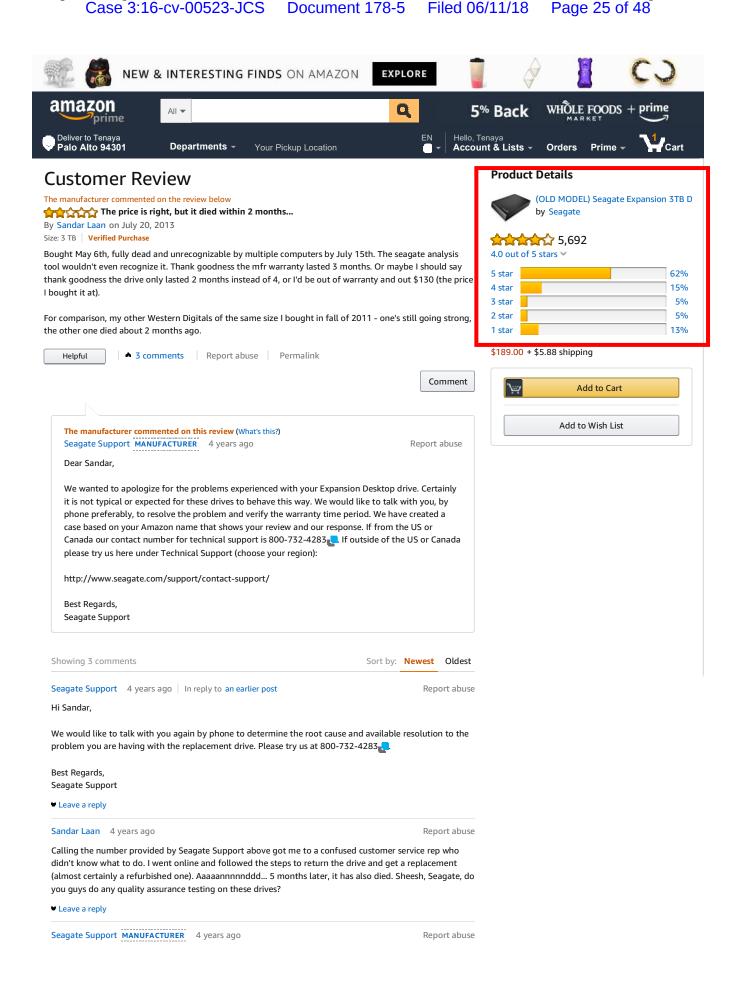
Wildness 2 years ago

Report abuse

I'm very surprised that they were willing at all to cover data recovery. No hard drive manufacturer warrants the data on the drive only the hardware itself. It is the responsibility of the user to maintain data backups. I see reviews all over Amazon that seem to blame the manufacturer for loss of data that has never been backed up; the funniest of these are those that cry that this isn't the first time a drive has destroyed data they didn't have backed up. If drives are unreliable, then that is worth reviewing... if data is backed up, stop blaming the hardware manufacturer.

■ Leave a reply

EXHIBIT D



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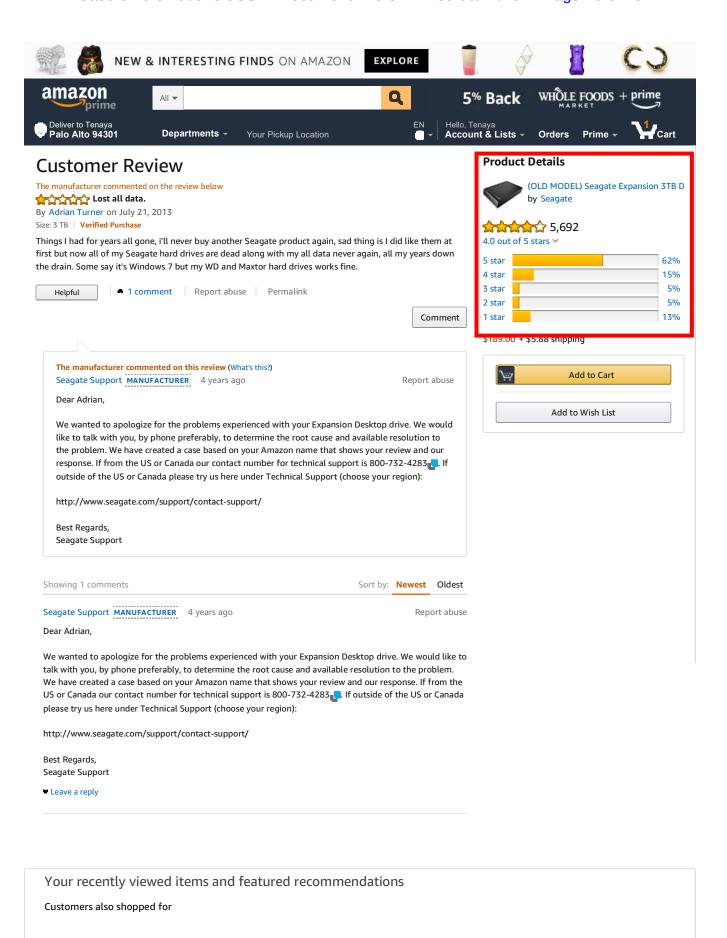


EXHIBIT E

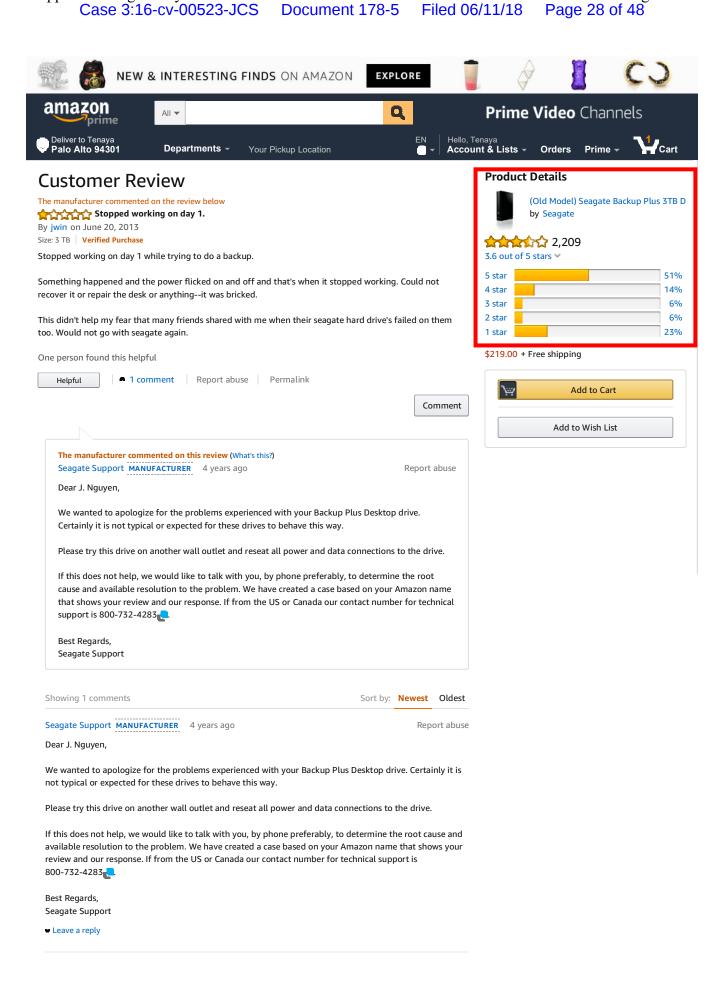


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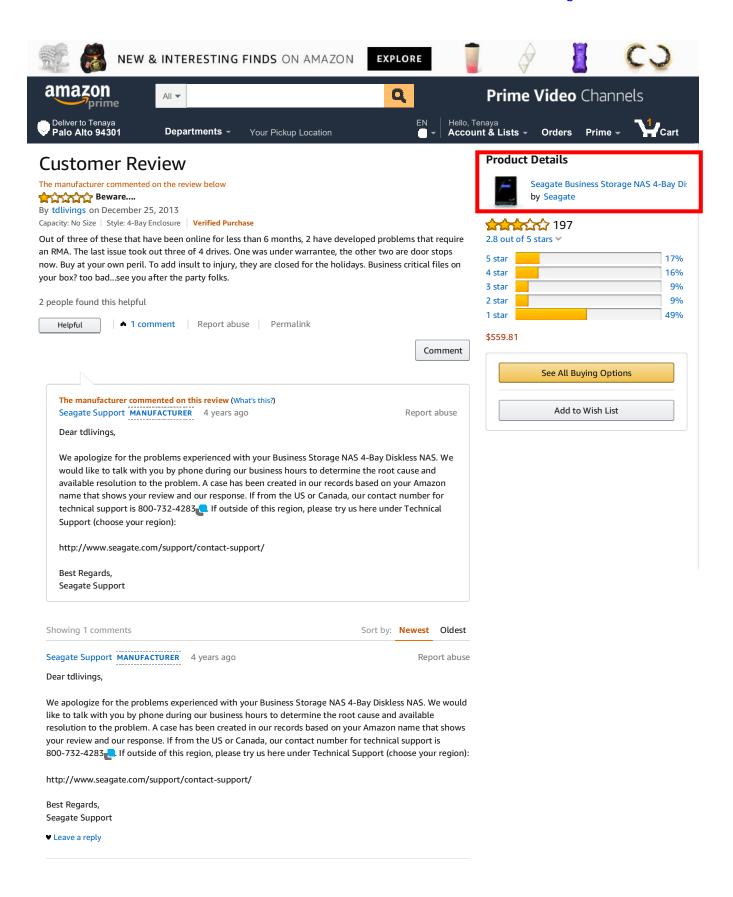
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4905346	BUSINESS4BAYNAS ELCAPITAN	STBP8000300	1BX5M3-570	NA6P0AEH	2016-01-14 02:53:41 (ANP
5246505	SEAGATEEXPANSIONE FALCONDESK	STBV3000300	1D7AM3-570	NA4M9YZ6	2016-01-14 05:37:18 / CS
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5246392	BUSINESS4BAYNAS ELCAPITAN	STBP4000300	1BX5M2-570	NA6P0GXN	2016-01-14 03:32:17 I ANP
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5246101	BUSINESS1BAYNAS SENTINEL	STBM3000100	1BV5N2-570	NA6100YY	2016-01-14 03:21:44 S ANP
5220272	BUSINESS2BAYNAS HALFDOME	STBN6000100	1BW5A4-570	NA6F0LT7	2016-01-14 03:08:26 S ANP
5214255	BUSINESS1BAYNAS SENTINEL	STBM4000300	1BV5M3-570	NA6109RM	2016-01-13 07:59:11 (TS
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5242553	BUSINESS4BAYNAS ELCAPITAN	STBP8000200	1BX5D3-570	NA6P08QM	2016-01-13 08:58:51 E CS
5232041	BUSINESS2BAYNAS HALFDOME	STBN200	1BW5D1-570	NA6F0QLJ	2016-01-13 08:42:20 I ANP
5235911	BUSINESS2BAYNAS HALFDOME	STBN6000200	1BW5D4-570	NA6F0H12	2016-01-13 08:12:30 JANP
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5244591	FALCONDESK	STBV3000300			2016-01-13 08:56:03 ITS
5217803	BUSINESS2BAYNAS HALFDOME	STBN4000100	1BW5A3-570	NA6F08ZR	2016-01-14 00:33:14 J Misc.
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CSO L2 FILTER C	CSO_L3_SYMPTOMC	CSO L4 CAUSE C	STOWD UNTIL C
ANP - Hardware - Assistance	Installation	Guide not clear	 13-Jan-16
Software - Assistance	Web UI / Firmware	Setup	13-Jan-16
RMA	Customer Request	Explained Policy	13-Jan-16
ANP - Hardware - Troubleshooting	Hard Drive	Format / Reformat	14-Jan-16
ANP - Hardware - Assistance	Web UI / Firmware	Setup	13-Jan-16
ANP - Hardware - Troubleshooting	Hardware and Power Supply	Broken Components	13-Jan-16
ANP - Hardware - Troubleshooting	Hardware and Power Supply	Broken Components	14-Jan-16
ANP - Hardware - Troubleshooting	Hard Drive	S.M.A.R.T. Failed / Seatools Test Failed	14-Jan-16
Hardware - TroubleShooting	Drive Issues	Refer to Online Support	13-Jan-16
Warranty	Policy	Explained Policy	13-Jan-16
Warranty	Policy	Explained Policy	13-Jan-16
ANP - Hardware - Troubleshooting	Web UI / Firmware	Setup	13-Jan-16
ANP - Hardware - Troubleshooting	Hard Drive	S.M.A.R.T. Failed / Seatools Test Failed	13-Jan-16
ANP - Hardware - Troubleshooting	Web UI / Firmware	Network Settings	13-Jan-16
Hardware - TroubleShooting	Drive Issues	Drive full/Reformat Drive	13-Jan-16
Thank You Email	Thank You Email	Thank You Email	13-Jan-16
Warranty	Warranty Validation	Provided Warranty End Date	14-Jan-16
Warranty	Policy	Explained Policy	13-Jan-16
Warranty	Warranty Validation	Provided Warranty End Date	13-Jan-16
Warranty	Warranty Validation	Provided Warranty End Date	13-Jan-16
ANP - Hardware - Troubleshooting	Hard Drive	Format / Reformat	14-Jan-16
ANP - Hardware - Troubleshooting	Hardware and Power Supply	Broken Components	13-Jan-16
Thank You Email	Thank You Email	Closed Case	14-Jan-16
Warranty	Policy	Explained Policy	13-Jan-16
ANP - Hardware - Troubleshooting	Hard Drive	Format / Reformat	14-Jan-16
Software - Troubleshooting	Tappin	Certificate Update - Firmware Needed	14-Jan-16
Software - Troubleshooting	OS / Network	OS Corrupted	13-Jan-16
ANP - Hardware - Assistance	Installation	Walk-through	13-Jan-16
Warranty	Process	Explained Policy	13-Jan-16
RMA	Customer Request	Explained Policy	13-Jan-16
ANP - Hardware - Troubleshooting	Hard Drive	Format / Reformat	13-Jan-16
ANP - Hardware - Troubleshooting	Web UI / Firmware	Nas Frozen / Reboot Nas	13-Jan-16
ANP - Hardware - Troubleshooting	Web UI / Firmware	Setup	13-Jan-16
RMA Status	Not Received	Refer to Online Support	13-Jan-16
ANP - Hardware - Troubleshooting	Hardware and Power Supply	Broken Components	3-Feb-16
ANP - Hardware - Troubleshooting	Hard Drive	Format / Reformat	13-Jan-16
ANP - Hardware - Troubleshooting	Hard Drive	Installation	13-Jan-16
Accessory	Defective Accessory	Additional Information Requested	13-Jan-16
Duplicate Case/Email	Duplicate Case/Email	Duplicate Case/Email	13-Jan-16
RMA	Customer Request	Requested Additional Information	13-Jan-16
	•		

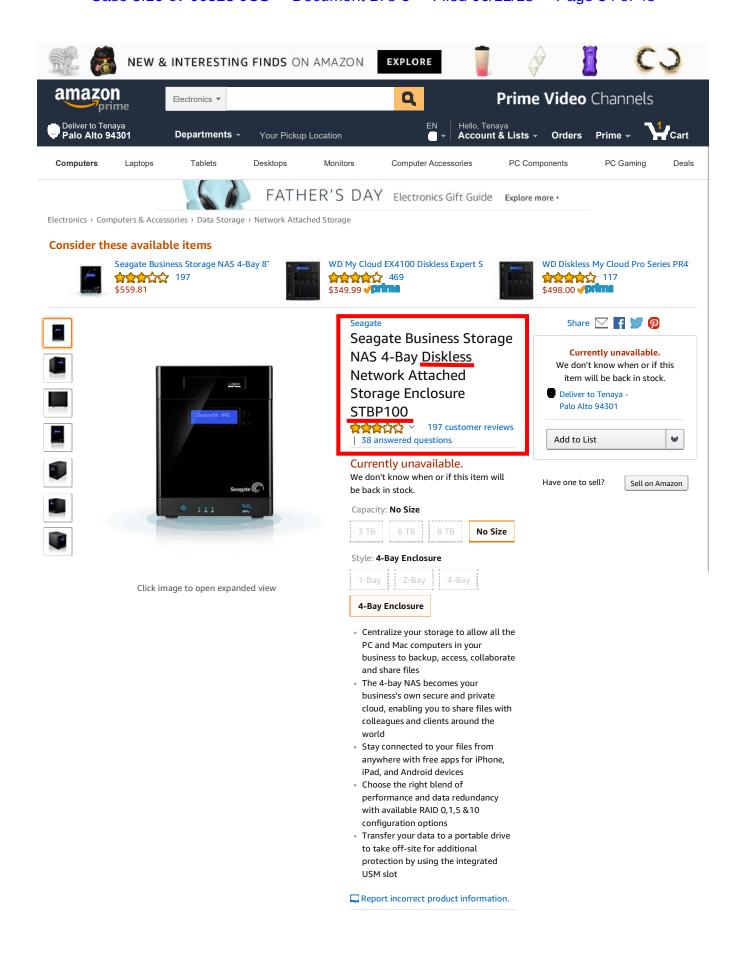
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Beware.... Page 1 of 2

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Sponsored products related to this item (What's this?)

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NETGEAR ReadyNAS Ultra 2: 4 TB (2 x 2 TB) Network Attached Storage RNDU2220

\$799.00



Buffalo TeraStation 1400D Desktop 12 TB NAS with Hard Drives Included 49 \$544.55



Buffalo TeraStation 3410DN Desktop 16 TB NAS Hard Drives Included 41 \$840.13



ZyXEL [NAS520] 6TB Personal Cloud Storage [2-Bay] for Home with iOS & Android Remot... 2 \$299.99



Buffalo TeraStation 5410DN Desktop 24 TB NAS Hard Drives Included 11,472.57

Ad feedback

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Seagate NAS 4-Bay Diskless Network Attached Storage Drive (STCU100)

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Q

Product description

Capacity:No Size | Style:4-Bay Enclosure

Product Description

The Seagate Business Storage 4-bay NAS is a complete network storage solution designed for up to 50 employees by creating a secure private cloud. With the included backup software for Windows, Time Machine compatibility and RAID protection, it's simple to keep your critical business files protected and creates a shared space for your colleagues and clients to collaborate by storing files centrally. With Global Access service, stay connected to your business with free apps for iPhone, iPad and Android devices. Features a Web interface where clients and coworkers can securely download and upload large files. The Business Storage 4-bay NAS comes with everything your business needs to ensure complete protection for computer files. The included BlackArmor backup software for Windows PCs will automate the process and help you protect data by backing up not only the files you store, but also the programs, settings and even the operating system on your local PCs, you can restore the entire hard drive on a PC that has suffered a hardware failure. By supporting Time Machine software, the Business Storage 4-bay NAS offers the same level of data protection for all theMac

EXHIBIT H [REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED]

EXHIBIT I

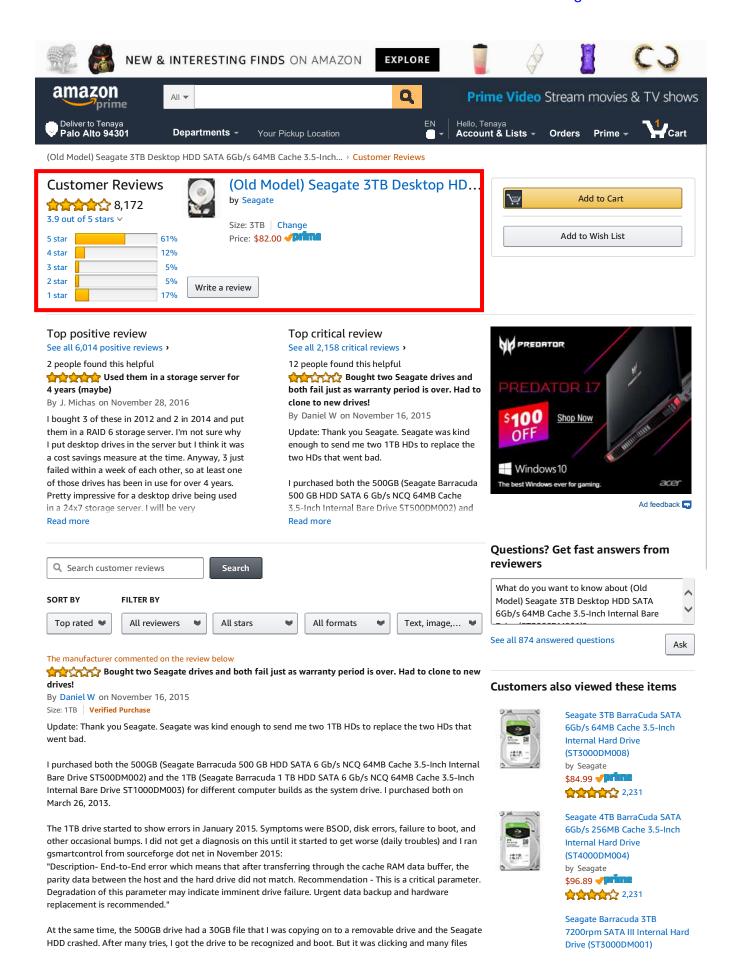
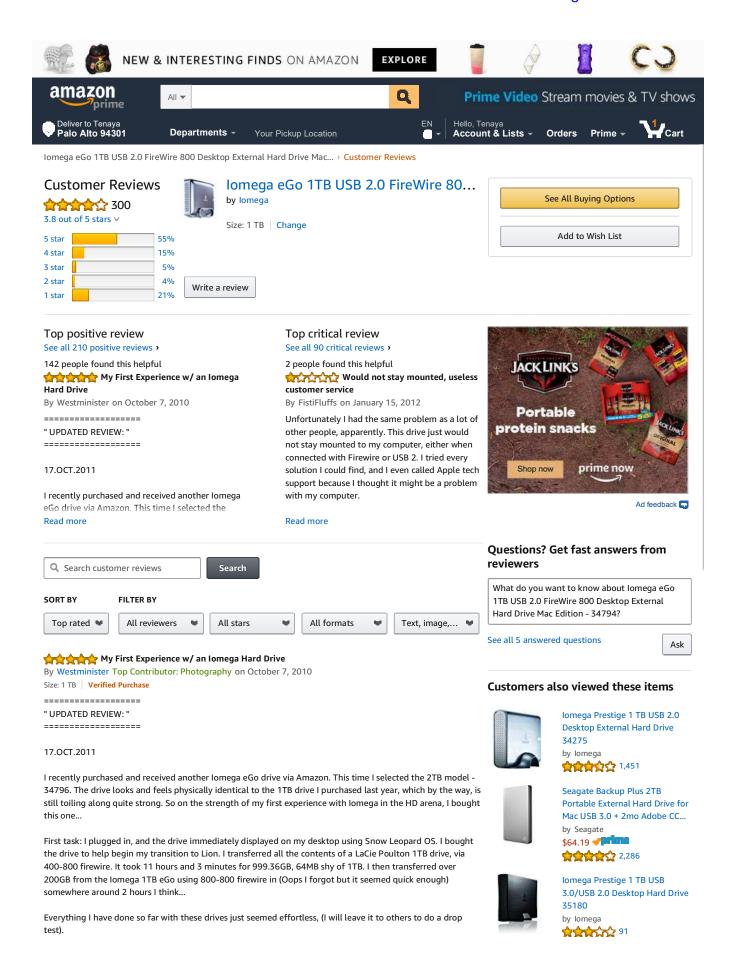
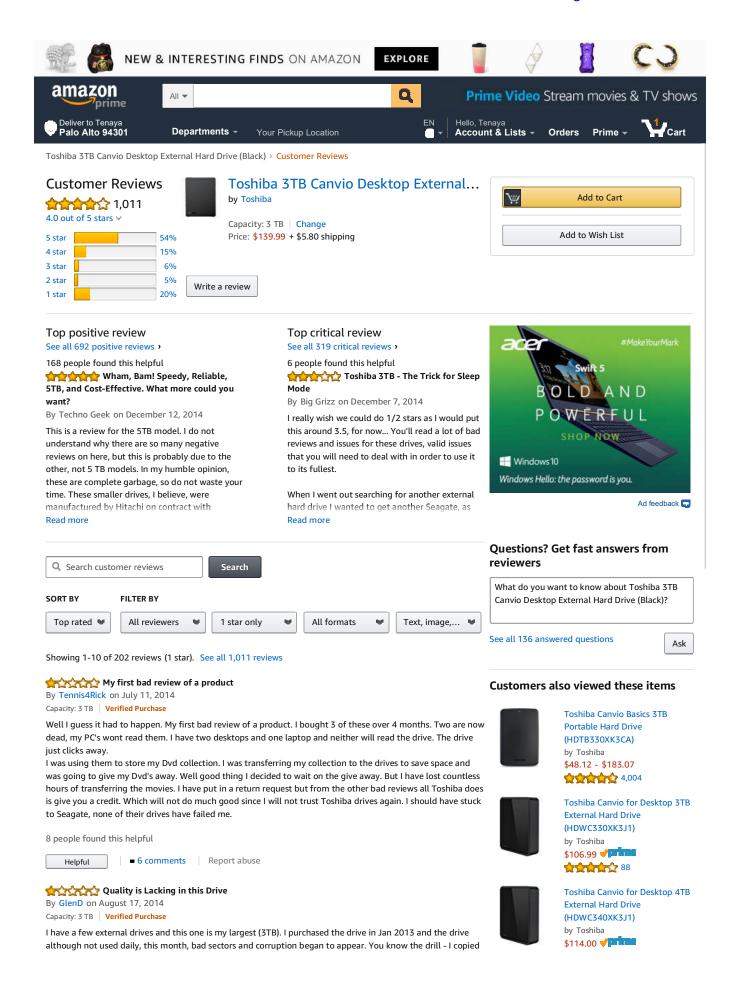
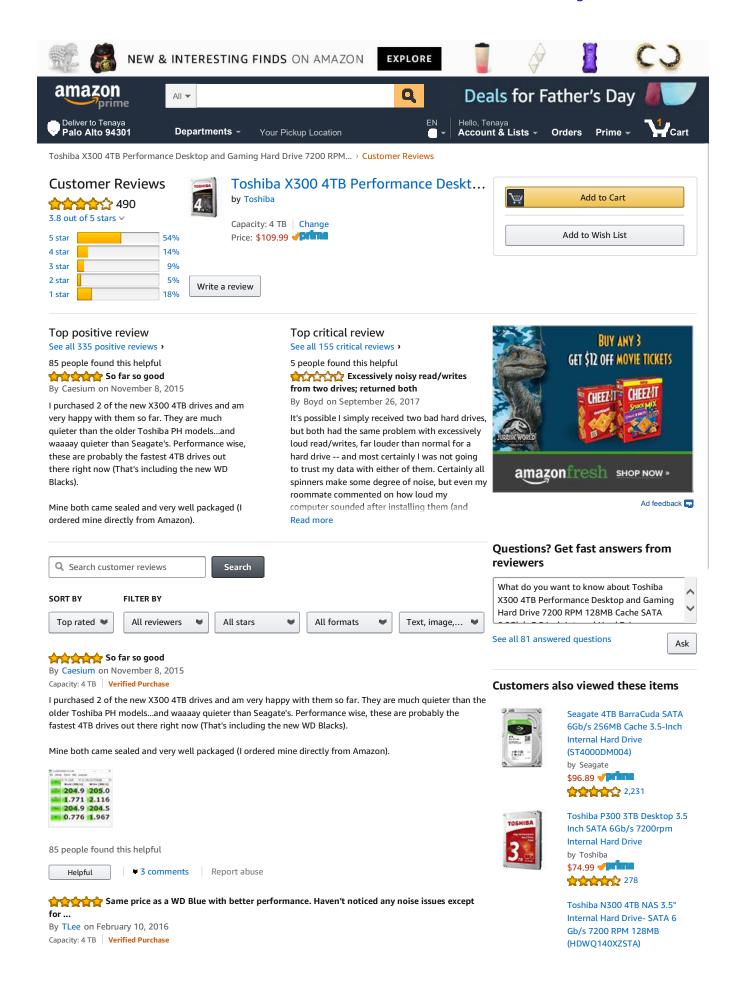
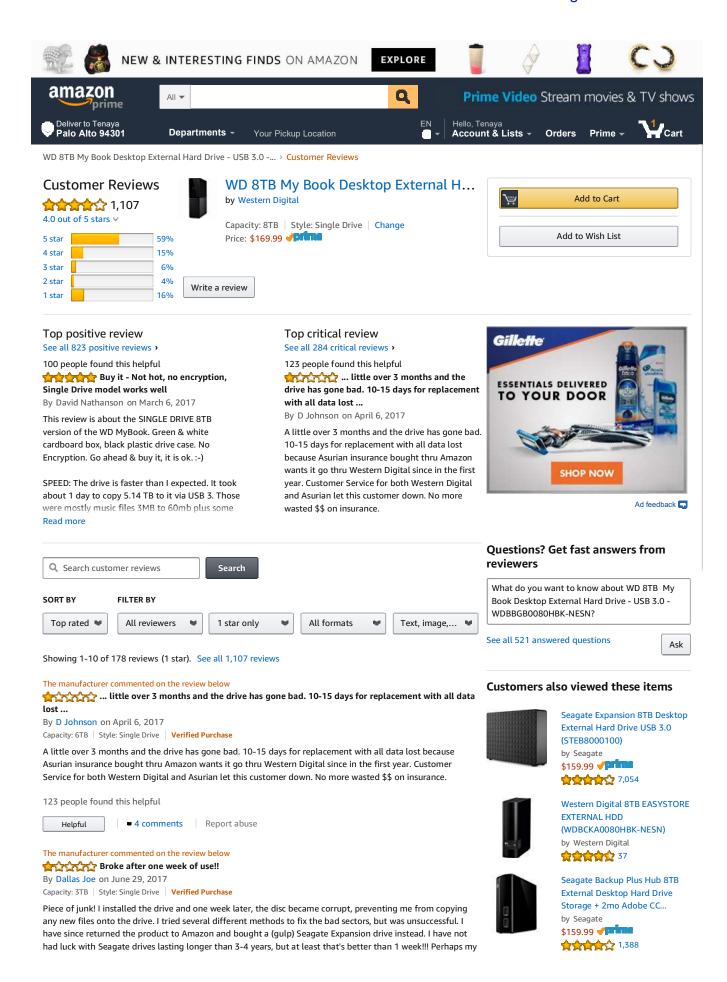


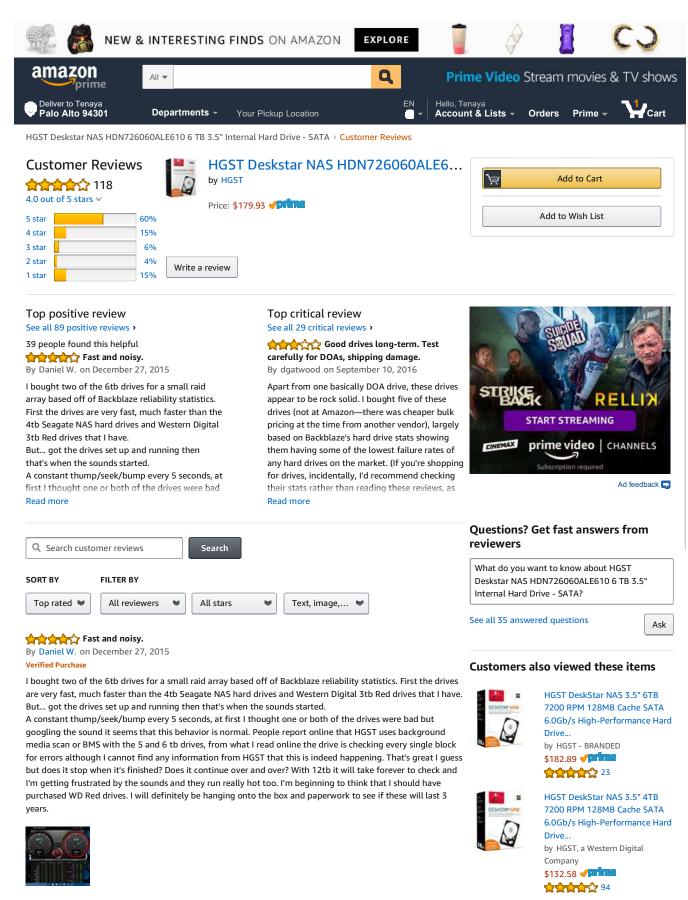
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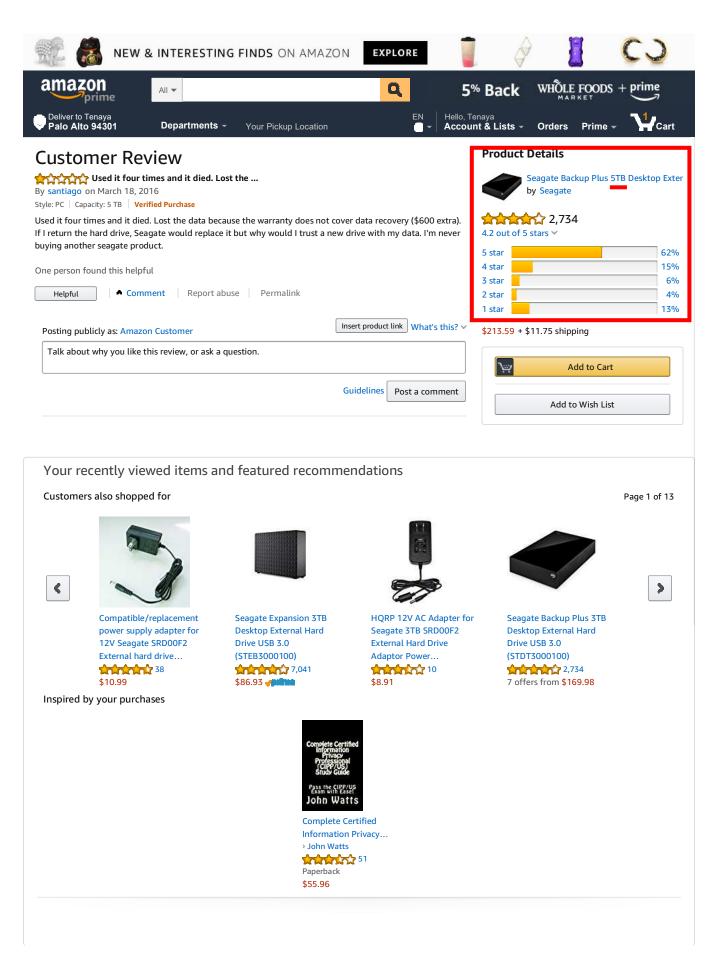




39 people found this helpful

EXHIBIT K

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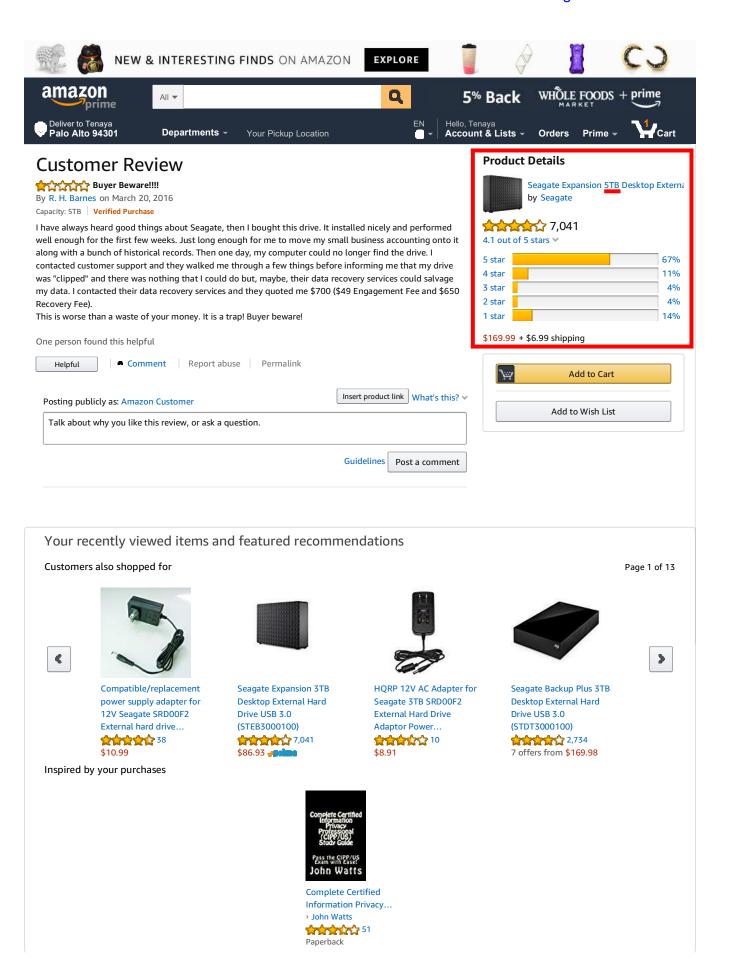


EXHIBIT L [REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED]